



June 22, 2017

Via ECF

Honorable Andrew L. Carter, Jr.  
United States District Court Judge  
Thurgood Marshall  
United States Courthouse  
40 Foley Square  
New York, NY 10007

Re: *Louis B. Cushman v. Brent Borland and Borland Capital Group*  
Case No.: 1:17-cv-01795(ALC)(AJP)

Dear Judge Carter:

Pursuant to this Court's Order dated May 19, 2017, and after the Court extended all deadlines for 7 Days, the Defendants' Motion to Dismiss is due June 22, 2017. Counsel for Plaintiff has consented to an additional Fourteen (14) day extension for the Defendants to file their Motion to Dismiss to July 6, 2017. Accordingly, the Defendants request that all subsequent deadlines also be extended by the Fourteen (14) days. Therefore, the Opposition to the Motion to Dismiss would be moved to July 27, 2017 and the Defendants' Reply would be moved to August 3, 2017. The parties are engaged in active settlement negotiations and request the Fourteen (14) day extension of all deadlines to dedicate themselves to settlement discussions. This is the second request for an extension since the Court's Order dated May 19, 2017.

Defendants are respectfully requesting this Fourteen (14) day extension of all current Motion to Dismiss deadlines as follows: Defendants' Motion July 6, 2017, Plaintiff's Opposition July 27, 2017 and Defendants' Reply if any August 3, 2017.

Very truly yours,

DAVID FILLER, ESQ.  
For the Firm  
Bar Admission No.: 2567071

cc. Gerry Silver, Victoria Kennedy

FILLER RODRIGUEZ, LLP  
1688 Meridian Ave., Suite 900  
Miami Beach, Florida 33139  
crodriguez@fillerrodriguez.com

T: 305.672.5007  
F: 305.672.0470  
fillerrodriguez.com